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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 JASON PROCTOR,

9 Plaintiff,

10 vs.

11 STATE FARM MUTUAL AUTOMOBILE
 INSURANCE COMPANY; DOE INDIVIDUALS
 12 1-20, inclusive; and ROE CORPORATIONS 1-20,
 inclusive,

13 Defendants.

CASE NO.: 2:23-cv-01513-JAD-EJY

**STIPULATION AND ~~(PROPOSED)~~
 ORDER TO EXTEND DISCOVERY
 DEADLINES**

First Request

14
 15 COME NOW, Plaintiff, JASON PROCTOR, by and through his counsel of record, Dimopoulos
 16 Law Firm, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by
 17 and through its counsel of record, Carmen Cooney Forbush, hereby stipulate to extend all discovery
 18 deadlines, including for the Parties to serve their disclosure of experts and expert reports for a period of
 19 approximately ninety (90) days.

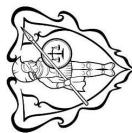
20 1. The Parties experienced unforeseeable delays initiating discovery due to change of
 21 counsel.

22 2. During the course of discovery, Defendant recently disclosed an additional 3,862 pages
 23 of records on June 26, 2024 that are at the crux of several claims and defenses asserted herein that must
 24 be reviewed and analyzed by experts on each side before the upcoming expert disclosure deadlines.

25 3. The Parties are actively discussing resolution and may need to engage in a second
 26 mediation to resolve this matter.

27 4. The Parties need additional time to resolve this matter before engaging in costly expert
 28 discovery.

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1
2 5. The Parties hereby stipulate to the proposed discovery deadlines:

Deadline	Old Date	New Date
Initial Expert Disclosures	August 19, 2024	November 19, 2024
Rebuttal Expert Disclosures	September 18, 2024	December 19, 2024
Discovery Cut-off	October 18, 2024	January 16, 2025
Dispositive Motion Deadline	November 15, 2024	February 15, 2025

9 DATED this 30th day of July, 2024

10 DIMOPOULOS LAW FIRM

11
12 /s/ Michael L. Shirts
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16 *Attorneys for Plaintiff Jason Proctor*

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19 /s/ Sean D. Cooney
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23 *Attorneys for Defendant State Farm
Mutual Automobile Insurance Company*

24 // //

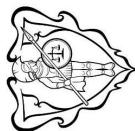
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ORDER

The Court, having considered the Parties' Stipulation to Extend Time for Discovery, and good cause appearing, hereby ORDERS that Discovery deadlines be continued as follows:

Deadline	Old Date	New Date
Initial Expert Disclosures	August 19, 2024	November 19, 2024
Rebuttal Expert Disclosures	September 18, 2024	December 19, 2024
Discovery Cut-off	October 18, 2024	January 16, 2025
Dispositive Motion Deadline	November 15, 2024	February 15, 2025

IT IS SO ORDERED.

Dated this 8th day of August, 2024.

By Elayna J. Youchal
Hon. Elayna J. Youchal
U.S. Magistrate Judge

